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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

Approximately 69,370 Bitcoin (BTC), Bitcoin
Gold (BTG), Bitcoin SV (BSV), and Bitcoin
Cash (BCH) seized from
1HQ3Go3ggs8pFnXuHVHRytPCq5fGG8Hbhx

Defendant.

First 100, LLC, 1st One Hundred Holdings,
LLC, and Battle Born Investments
Company, LLC,

Claimants.

CASE NO. CV 20-7811 RS

**STIPULATION TO UNSEAL THE CLAIMS
AND ANSWERS OF CLAIMANTS BATTLE
BORN INVESTMENTS COMPANY, LLC,
FIRST 100, LLC AND 1ST ONE HUNDRED
HOLDINGS, LLC; ORDER**

1 Pursuant to Civil L.R. 7-12, Plaintiff United States of America (“United States”), and Claimants
2 Battle Born Investments Company, LLC; First 100, LLC; and 1st One Hundred Holdings, LLC
3 (collectively and hereinafter, “Claimants”), by and through their respective counsel, hereby stipulate to
4 the following:

5 WHEREAS on March 16, 2021 Claimants filed an administrative motion to file their claims
6 under seal (*see* Dkt. No. 62);

7 WHEREAS on April 5, 2021 Claimants filed an administrative motion to file their answers
8 under seal (*see* Dkt. No. 64);

9 WHEREAS the reason provided for Claimants’ requests is that Claimants believe that the
10 content of those documents “relate to or may reveal the identity of the ‘Individual X’ referenced in the
11 First Amended Complaint filed by the United State Attorney’s Office in this action” (*see* Dkt. Nos. 62
12 and 64);

13 WHEREAS Claimants filed redacted versions of their claims and answers in the public record
14 and filed under seal unredacted versions of those documents;

15 WHEREAS this Court granted Claimants’ administrative requests to file their claims and
16 answers under seal in light of the concerns related to Individual X (Dkt. Nos. 63, 65);

17 WHEREAS the United States has taken the position that nothing in the redacted portions of
18 Claimants claims or answers relates to or reveals the identity of Individual X and therefore, in its view,
19 there is no concern regarding the confidentiality of that individual and accordingly no need to withhold
20 the information in Claimants’ filings from the public record;

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1 NOW, THEREFORE, the parties hereby stipulate that Claimants claims and answers—
2 specifically, Dkt. Nos. 62-5 (First 100 LLC claim), 62-6 (Battle Born claim), 64-5 (Verified Answer of
3 Battle Born), 64-6 (Answer of First 100 Claimants)—shall be unsealed and filed in the public record in
4 their entirety and without redactions.

5 IT IS SO STIPULATED.

6 DATED: July 12, 2021

STEPHANIE M. HINDS
Acting United States Attorney

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8 /s/ Claudia A. Quiroz
DAVID COUNTRYMAN
CHRIS KALTSAS
CLAUDIA A. QUIROZ
WILLIAM FRENTZEN
Assistant United States Attorneys

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12 DATED: July 12, 2021

FOX ROTHSCHILD LLP

13 /s/ Dwight Craig Donovan
14 DWIGHT CRAIG DONOVAN
Attorneys for Claimants
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ORDER

GOOD CAUSE APPEARING and per the parties' stipulation, IT IS HEREBY ORDERED that the claims and answers of Claimants Battle Born Investments Company, LLC; First 100, LLC; and 1st One Hundred Holdings, LLC shall be unsealed and filed in the public record in their entirety and without redactions. The documents to be unsealed are the following: Dkt. Nos. 62-5 (Unredacted version of First 100 LLC claim), 62-6 (Unredacted version of Battle Born claim), 64-5 (Unredacted Verified Answer of Battle Born), 64-6 (Unredacted Verified Answer of First 100 Claimants).

IT IS FURTHER ORDERED THAT the Office of the Clerk shall unseal these documents and file them in the public record.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: July 13, 2021



HONORABLE RICHARD SEEBORG
UNITED STATES CHIEF DISTRICT COURT JUDGE